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9 Attorneys for Defendant HARRIS & HARRIS, LTD.

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRISTOPHER MARAKOVITZ,  
Plaintiffs,  
vs.  
HARRIS & HARRIS, LTD.,  
Defendant.

Case No.

**NOTICE OF REMOVAL**

Courtroom:

Removed:

**TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

**PLEASE TAKE NOTICE THAT** pursuant to the provisions of 28 U.S.C., sections 1441(a) and 1446, Defendant HARRIS & HARRIS, LTD. ("Defendant") hereby removes to this Court the state action currently pending in the Los Angeles County Superior Court of California, described more fully below:

1. On June 5, 2015, a civil action was commenced in the Superior Court of the State of California, in and for the County of Los Angeles, entitled *Christopher Marakovitz v. Harris & Harris, Ltd.*, and pending under Case No. 15K06783.

2. In light of the pendency in Los Angeles County, the United States District Court for the Central District of California, Western Division is the proper forum for removal pursuant to 28 U.S.C. §§84(c)(2) and 1441(a).

3. The Complaint asserts a federal cause of action against Defendant for purported violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* and violations of the Telephone Consumer Protection Act, 47 U.S.C. §227, *et seq.*, and may be removed to this Court pursuant to 28 U.S.C. §1446(b) because it invokes federal question jurisdiction. Pursuant to 28 U.S.C. 1367(a) and 1441(c), this Court may exercise supplemental jurisdiction over the remaining claim for purported violation of the Rosenthal Fair Debt Collection Practices Act, *California Civil Code* §1788 *et seq.*

4. On June 17, 2015, Defendant was served with a copy of the Summons, Complaint, Civil Case Cover Sheet, Civil Case Cover Sheet Addendum and Statement of Location, and General Order, true and correct copies of which are collectively attached hereto as **Exhibit A** and incorporated herein by this reference. The aforementioned documents constitute true and correct copies of all process, pleadings and orders attempted to be served upon Defendant.

5. This Notice was filed with the Clerk of the United States District Court within thirty (30) days after service of the Complaint was effectuated upon Defendant. It is therefore timely under 28 U.S.C. §1446(b).

DATED: July 15, 2015

HINSHAW & CULBERTSON LLP

By: /s/ Renee C. Ohlendorf  
 Renee Choy Ohlendorf  
 Attorneys for Defendant HARRIS &  
 HARRIS, LTD.

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within actions; my business address is 11601 Wilshire Blvd., Suite 800, Los Angeles, CA 90025.

On July 15, 2015, I served the document(s) entitled **NOTICE OF REMOVAL** on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope(s) addressed as stated below:

**Todd M. Friedman**  
**Suren N. Weerasuriya**  
**Adrian R. Bacon**  
**Law Offices of Todd M. Friedman**  
**324 S. Beverly Drive, #725**  
**Beverly Hills, CA 90212**  
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**Attorneys for Plaintiff**

☒ **(BY MAIL):** I deposited such envelope in the mail at Los Angeles, California with postage fully prepaid. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be placed for collection and mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

☒ **(BY CM/ECF SERVICE):** I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

Executed on July 15, 2015, at Los Angeles, California.

**(FEDERAL):** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct

/s/ Melanie Davis  
**MELANIE DAVIS**